

Eric L. Cramer (*pro hac vice*)
 BERGER MONTAGUE PC
 1818 Market Street, Suite 3600
 Philadelphia, PA 19103
 Telephone: (215) 875-3000
 Facsimile: (215) 875-4604
 ecramer@bm.net

William A. Isaacson (*pro hac vice*)
 PAUL, WEISS, RIFKIND, WHARTON &
 GARRISON LLP
 2001 K Street, NW
 Washington, DC 20006
 Telephone: (202) 223-7313
 Facsimile: (202) 379-4937
 Email: wisaacson@paulweiss.com

*Co-Lead Counsel for the Le Class and
 Attorney for All Individual and Representative
 Plaintiffs*

*Attorney for Defendants Zuffa, LLC and
 Endeavor Group Holdings, Inc.*

[Additional Counsel Listed on Signature
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[Additional Counsel Listed on Signature
 Page]

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

CUNG LE, NATHAN QUARRY, JON FITCH,
 BRANDON VERA, LUIS JAVIER VAZQUEZ,
 AND KYLE KINGSBURY, on behalf of
 themselves and all others similarly situated,

No.: 2:15-cv-01045-RFB-BNW

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
 Championship and UFC,

Defendant.

KAJAN JOHNSON and CLARENCE
 DOLLAWAY, on behalf of themselves and all
 others similarly situated,

No.: 2:21-cv-01189-RFB-BNW

Plaintiffs,

v.

ZUFFA, LLC (d/b/a Ultimate Fighting
 Championship and UFC) and Endeavor Group
 Holdings, Inc.,

Defendants.

**SCHEDULING STIPULATION FOR BRIEFING
 ON DISCOVERY IN *LE* AND *JOHNSON***

Plaintiffs Kajan Johnson and Clarence Dollaway (“Plaintiffs”) and Defendants Zuffa LLC (“Zuffa”) and Endeavor Group Holdings, Inc. (“Endeavor,” together with Zuffa, “Defendants,” and collectively with Plaintiffs: the “Parties”), submit this stipulation on the briefing schedule for resolving the Parties’ dispute regarding whether discovery taken in *Le v. Zuffa*, No. 15-cv-0145 (D. Nev.) (“*Le*”) may be treated as taken in *Johnson v. Zuffa*, No. 21-cv-01189 (D. Nev.) (“*Johnson*”) and whether discovery taken in *Johnson* may be treated as taken in *Le*.

On September 22, 2023, the parties submitted a Joint Discovery Plan and Scheduling Order that, in relevant part for the purposes of this stipulation, stated:

The Parties are cognizant of the overlap between certain factual matters in the *Le* and *Johnson* cases. As a result, the Parties are meeting and conferring in an effort to come to agreement on whether discovery in each of the two actions should be treated as though taken in the other action, and if so, whether there should be any restrictions on such usage. Within the next thirty days, the Parties will either bring a stipulation to the Court for approval, or agree on an expedited briefing process to have the Court resolve the issue.

ECF No. 82 at 9. The Parties have conferred but failed to reach agreement on the issue of whether discovery in each of the two actions should be treated as though taken in the other action, and if so, whether there should be any restrictions on the use of such discovery.

Accordingly, and pursuant to Local Rule 7-2, the Parties have agreed to the following briefing schedule:

Case Event	Date
Defendants’ Motion re <i>Johnson</i> Discovery	October 26, 2023
Plaintiffs’ Opposition re Defendants’ Motion	November 9, 2023
Defendants’ Reply re Plaintiffs’ Opposition	November 16, 2023

The foregoing stipulation does not affect the briefing schedule the Court has already set for the motion the Court authorized Defendant Zuffa, LLC to file seeking to re-open discovery in

Nos: 2:21-cv-01189-RFB-BNW, 2:15-cv-1045-RFB-BNW

SCHEDULING STIPULATION FOR BRIEFING
ON DISCOVERY IN *LE* AND *JOHNSON*

Le v. Zuffa, LLC, No. 15-cv-1045 (D. Nev.), as set forth in ECF No. 847. Those deadlines remain as follows:

Case Event	Deadline
Defendant Zuffa, LLC's Motion to Re-Open Discovery in <i>Le v. Zuffa, LLC</i>	October 24, 2023
Plaintiffs' Opposition re Defendant's Motion	November 21, 2023
Defendant's Reply re Plaintiffs' Opposition	December 19, 2023

DATED: October 13, 2023

Respectfully Submitted,

By: /s/Eric L. Cramer
Eric L. Cramer

BERGER MONTAGUE PC
Eric L. Cramer (admitted *pro hac vice*)
Michael C. Dell'Angelo (admitted *pro hac vice*)
Patrick F. Madden (admitted *pro hac vice*)
Najah Jacobs (admitted *pro hac vice*)
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Phone: (215) 875-3000/Fax: (215) 875-4604
ecramer@bm.net
mdellangelo@bm.net
pmadden@bm.net
njacobs@bm.net

BERGER MONTAGUE PC
Joshua P. Davis (admitted *pro hac vice*)
505 Montgomery Street, Suite 625
San Francisco, CA 94111
jdavis@bm.net

JOSEPH SAVERI LAW FIRM, LLP
Joseph R. Saveri (admitted *pro hac vice*)
Kevin E. Rayhill (admitted *pro hac vice*)
601 California Street, Suite 1000
San Francisco, California 94108
Phone: (415) 500-6800/Fax: (415) 395-9940
jsaveri@saverilawfirm.com
krayhill@saverilawfirm.com

COHEN MILSTEIN SELLERS & TOLL, PLLC
Benjamin D. Brown (admitted *pro hac vice*)
Richard A. Koffman (admitted *pro hac vice*)
Daniel H. Silverman (admitted *pro hac vice*)

SCHEDULING STIPULATION FOR BRIEFING
ON DISCOVERY IN *LE* AND *JOHNSON*

1100 New York Ave., N.W., Suite 500, East Tower
Washington, DC 20005
Phone: (202) 408-4600/Fax: (202) 408 4699
bbrown@cohenmilstein.com
rkoffman@cohenmilstein.com
dsilverman@cohenmilstein.com

*Co-Lead Counsel for the Le Class and Attorneys for
All Individual and Representative Plaintiffs*

KEMP JONES, LLP
Don Springmeyer (Nevada Bar No. 1021)
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
(702) 385-6000/Fax: (702) 385-6001
d.springmeyer@kempjones.com

*Liaison Counsel for the Le Class and Attorneys for
All Individual and Representative Plaintiffs Kajan
Johnson and Clarence Dollaway*

WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC
Robert C. Maysey (admitted *pro hac vice*)
Jerome K. Elwell (admitted *pro hac vice*)
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Phone: (602) 264-7101/Fax: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

*Counsel for the Le Class and Attorneys for All
Individual and Representative Plaintiffs*

By: /s/ William A. Isaacson
William A. Isaacson

William A. Isaacson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7313
Facsimile: (202) 379-4937
Email: wisaacson@paulweiss.com

SCHEDULING STIPULATION FOR BRIEFING
ON DISCOVERY IN *LE* AND *JOHNSON*

Donald J. Campbell
J Colby Williams
CAMPBELL & WILLIAMS
710 South Seventh Street, Ste. A
Las Vegas, NV 89101
Telephone: (702) 382-5222
Facsimile: (702) 382-0540
Email: djc@cwlawlv.com
Email: jcw@cwlawlv.com

*Attorney for Defendants Zuffa, LLC and Endeavor
Group Holdings, Inc.*